

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :

v. :

DANA DOUGLASS-RODRIGUEZ :

: **CRIMINAL NO. 21-**

: **DATE FILED: _____**

: **VIOLATIONS:**

: **18 U.S.C. §1343 (wire fraud – 5 counts)**

: **42 U.S.C. § 408(a)(4) (Social Security fraud**

: **– 1 count)**

: **Notice of forfeiture**

INDICTMENT

COUNTS ONE THROUGH FIVE

(Wire Fraud)

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Retirement and Survivor’s Insurance (“RSI”) benefit program, pursuant to Title 42, United States Code, Sections 401-433.

2. The RSI program was an earned-right program funded through Social Security wage taxes. When an individual worked, that individual paid taxes on his or her wages into the Social Security trust fund. If that individual paid sufficient Social Security taxes to earn sufficient “credits,” as that term was defined for purposes of the Social Security Act, he or she became eligible to receive retirement benefits upon reaching a certain age.

3. RSI payments continued until the individual died.

4. The father of defendant DANA DOUGLASS-RODRIGUEZ, known to the grand jury and identified herein as "M.D.," received RSI benefits during his lifetime. No other individual was entitled to the benefits designated for M.D. The SSA provided these benefits through an electronic funds transfer to a Wells Fargo Bank account held in the name of M.D.

5. M.D. died on or about October 25, 2017.

6. SSA did not receive notification of M.D.'s death and continued to issue RSI benefits through electronic funds transfers to M.D.'s Wells Fargo Bank account.

THE SCHEME TO DEFRAUD

7. From in or about October 2017 through in or about September 2020, defendant

DANA DOUGLASS-RODRIGUEZ,

devised and intended to devise a scheme to defraud the SSA and to obtain money from the SSA in the form of benefit payments intended for M.D. by fraudulently converting to her own use the SSA benefits intended for M.D. that defendant DANA DOUGLASS-RODRIGUEZ was not entitled to receive.

8. It was the object of the scheme described in paragraph 7 for defendant DANA DOUGLASS-RODRIGUEZ to receive approximately \$68,880.00 in SSA payments intended for M.D. that she was not entitled to receive.

MANNERS AND MEANS

It was a part of the scheme that:

9. Defendant DANA DOUGLASS-RODRIGUEZ concealed the death of M.D. so that M.D.'s SSA benefits checks would continue to be deposited into M.D.'s Wells Fargo Bank account.

10. From in or about October 2017 to in or about September 2020, defendant DANA DOUGLASS-RODRIGUEZ fraudulently obtained and converted to her own use approximately \$68,880.00 in SSA benefits payments intended for M.D.

11. On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

DANA DOUGLASS-RODRIGUEZ,

for the purpose of executing the scheme described above, knowingly caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>WIRE TRANSACTION</u>
1	February 3, 2020	SSA payment of \$2010.00 by wire transfer from Philadelphia, Pennsylvania to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania.
2	March 3, 2020	SSA payment of \$2010.00 by wire transfer from Philadelphia, Pennsylvania to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania.
3	April 3, 2020	SSA payment of \$2010.00 by wire transfer from Philadelphia, Pennsylvania to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania.
4	May 1, 2020	SSA payment of \$2010.00 by wire transfer from Philadelphia, Pennsylvania to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania.

5	June 3, 2020	SSA payment of \$2010.00 by wire transfer from Philadelphia, Pennsylvania to Kansas City, Missouri, to East Rutherford, New Jersey, to Minneapolis, Minnesota, to Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania.
---	--------------	--

All in violation of Title 18, United States Code, Section 1343.

COUNT SIX

(Social Security Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and 9 through 10 of Counts One through Five of this indictment are realleged here.

2. From in or about October 2017 to in or about September 2020, in the Eastern District of Pennsylvania, and elsewhere, defendant

DANA DOUGLASS-RODRIGUEZ

in a matter within the jurisdiction of the SSA, having knowledge of the death of M.D., an event affecting his initial and continued right to any SSA RSI payments, knowingly and willfully concealed and failed to disclose the death of M.D. with the fraudulent intent to secure approximately \$68,880.00 in SSA RSI payments.

In violation of Title 42, United States Code, Section 408(a)(4).

NOTICE OF FORFEITURE

THE GRAND JURY CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1343, set forth in Counts One through Six of this Indictment, defendant

DANA DOUGLASS-RODRIGUEZ

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$68,880.00.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 981(a)(1)(C).

A TRUE BILL:

A black rectangular redaction box covering the signature of the Grand Jury Foreperson.

GRAND JURY FOREPERSON

A handwritten signature in cursive script, appearing to read "Jennifer Arbittier Williams for".

JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

DANA DOUGLASS-RODRIGUEZ

INDICTMENT

18 U.S.C. §1343 (wire fraud – 5 counts)
42 U.S.C. § 408(a)(4) (Social Security fraud – 1 count)

~~A true bill.~~



Filed in open court this _____ day,
Of _____ A.D. 20____

Clerk

Bail, \$ _____
